(CAPTION OMITTED)

Bill of Complaint filed March 11, 1957, page 5, paragraph 9:

> "The defendant, State Road Department, has recently notified the plaintiff that it intends to tear down and destroy all signs placed on the Old State Road 4-A, including the signs belonging to the Plaintiff, as shown by Plaintiff's Exhibit "C", despite the fact that the defendant, State Road Department, has not maintained the Old State Road 4-A; nor have they taken any legal steps to acquire title thereto from the Plaintiffs; by due process of law and any such removal of Plaintiff's signs by the defendant abovementioned will cause great loss and injury to the Plaintiff as well as depriving Plaintiff of its legal rights, without due process of law."

(CAPTION OMITTED)

Amended Bill of Complaint filed December 10, 1957, page 7, paragraph 10:

> "That the original taking by the State Road Department, the defendant herein and its predecessors in office, was in direct violation of the Constitution of the State of Florida and the Constitution of the United States, which guarantees to every citizen and individual, the right of property, which shall not be taken without due process of law, and that by operation of this taking, the Plaintiff has been deprived of its property without having its day in Court, and without any legal due process whatsoever."